

TOMPKINS, McGUIRE, WACHENFELD & BARRY, LLP

Counselors at Law

3 BECKER FARM ROAD, SUITE 402
ROSELAND, NEW JERSEY 07068-1726
Roseland (973) 622-3000
New York (212) 714-1720

James J. O'Hara
Partner

FAX (973) 623-7780
www.tompkinsmcguire.com

Direct Line (973) 623-7041
johara@tompkinsmcguire.com

May 25, 2023

Via ECF

The Honorable Michael A. Hammer,
United States Magistrate Judge
Martin Luther King, Jr. Federal Building
And Courthouse, 2nd Floor
50 Walnut Street
Newark, New Jersey 07102

Re: *Bianchi v. Samsung Electronics America, Inc. et al.*
Civil Action No.: 2:17-cv-01263-CCC-MAM

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant, Samsung Electronics America, Inc. ("SEA"), in the above-referenced matter. As per Your Honor's direction in the Order of March 6, 2023, we are providing a joint status report.

The parties have now entered the final stage of the Settlement Agreement reached with the assistance of the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.). A settlement outreach has been launched to customers who were identified through a deliberate process as potentially part of Plaintiffs' putative class and will now be offered individual settlements. We anticipate a swift response period. We therefore respectfully request that Your Honor allow us to report back in July 2023.

Respectfully,

/s/ James J. O'Hara

JAMES J. OHARA

On behalf of Defendant,
Samsung Electronics America, Inc.

Respectfully,

/s/ Jonathan Shub

On behalf of Plaintiffs

Cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)